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Attorney for Defendant
ROBERT CRIST

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,
vs.
ROBERT CRIST
Defendant.) Case No. 2:22-cr-00229-DJC
) STIPULATION AND ORDER TO CONTINUE
) STATUS CONFERENCE
)
) Date: May 11, 2023
) Time: 9:00 a.m.
) Judge: Hon. Daniel J. Calabretta

IT IS HEREBY STIPULATED by and between Phillip A. Talbert, United States Attorney, through Assistant United States Attorney Emily Sauvageau, attorney for Plaintiff and Federal Defender Heather E. Williams through Assistant Federal Defender Hannah R. Labaree, attorney for ROBERT CRIST, that the status conference, currently scheduled for May 11, 2023, be continued to June 29, 2023 at 9:00 a.m.

To date, the government has produced approximately 338 Bates-stamped items in discovery. The parties are in conversation regarding the application of the Sentencing Guidelines to the instant case. The government has indicated to the defense that additional information related to the alleged drug quantity is forthcoming within the next 30 – 60 days.

Defense counsel thus requires additional time to review the discovery, conduct legal research related to the application of sentencing law to Mr. Crist's case, meet with her client, and conduct independent investigation. The parties therefore request a T4 exclusion of time for defense investigation until June 29, 2023.

Based upon the foregoing, the parties agree time under the Speedy Trial Act should be excluded from this order's date through and including June 29, 2023; pursuant to 18 U.S.C. §3161 (h)(7)(A) and (B)(iv)[reasonable time to prepare] and General Order 479, Local Code T4 based upon continuity of counsel and defense preparation.

Dated: April 27, 2023

HEATHER E. WILLIAMS
Federal Defender

/s/ Hannah R. Labaree
HANNAH R. LABAREE
Assistant Federal Defender
Attorney for Defendant
ROBERT CRIST

Dated: April 27, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ *Emily Sauvageau*
EMILY SAUVAGEAU
Assistant U.S. Attorney
Attorney for Plaintiff

ORDER

IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties' stipulation, and good cause appearing therefore, adopts the parties' stipulation in its entirety as its order. The Court specifically finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds the ends of justice are served by granting the requested continuance and outweigh the best interests of the public and defendant in a speedy trial.

The Court orders the time from the date the parties stipulated, up to and including June 29, 2023, shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and(B)(iv) [reasonable time for counsel to prepare] and General Order 479, (Local Code T4). It is further ordered the May 11, 2023 status conference shall be continued until June 29, 2023, at 9:00 a.m.

Dated: April 28, 2023

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE